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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO
individually and on behalf of all similarly
situated,

Plaintiffs,

v.

GOOGLE LLC,
Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**JOINT STIPULATION AND [PROPOSED]
ORDER CONTINUING DEADLINES FOR
DISCOVERY AND CLASS
CERTIFICATION**

Judge: Honorable Yvonne Gonzalez Rogers

1 Pursuant to Civil Local Rules 6-2 and 7-12, this joint stipulation is entered into between
 2 Plaintiffs and Defendant Google LLC (“Google”), collectively referred to as the “Parties.”

3 WHEREAS, the Parties are diligently scheduling numerous Rule 30(b)(6) depositions;

4 WHEREAS, the availability of witnesses and counsel will require the scheduling of some of
 5 the remaining depositions to occur within seven or fewer days of the current deadline of March 25,
 6 2022 to exchange opening expert reports (Dkt. 465);

7 WHEREAS, Google filed a motion seeking an additional week to respond to Plaintiffs’
 8 Request For an Order For Google To Show Cause For Why It Should Not Be Sanctioned For
 9 Discovery Misconduct (Dkt. 430, “Sanctions Motion”);

10 WHEREAS, to resolve that dispute and aid the Parties in having a more orderly and
 11 efficient exchange of opening expert reports and subsequent exchanges in connection with the
 12 remaining depositions, the Parties agreed to the schedule below.

13 NOW THEREFORE, the Parties stipulate to the following revised schedule regarding
 14 certain discovery and class certification deadlines.

- 15 1. The deadline for Google’s Opposition to Plaintiffs’ Sanctions Motion is extended from
 16 March 24, 2022 as ordered in Dkt. 443 to March 31, 2022.
- 17 2. The deadline for exchange of opening expert reports is extended from March 25, 2022
 18 to April 1, 2022.
- 19 3. The deadline for Plaintiffs’ Reply in support of the Sanctions Motion is extended from
 20 April 7, 2022 to April 11, 2022.
- 21 4. The deadline for the Parties’ submission of Proposed Findings of Fact and Conclusions
 22 of Law for the Sanctions Motion is extended from April 14, 2022 to April 18, 2022.
- 23 5. The evidentiary hearing on the Sanctions Motion scheduled for April 21, 2022 will
 24 proceed as scheduled, on April 21, 2022.
- 25 6. The deadline for exchange of rebuttal expert reports is extended from April 22, 2022 to
 26 May 6, 2022.
- 27 7. The deadline for close of expert discovery is extended from May 26, 2022 to June 2,
 28 2022.

8. The last day to file a motion for class certification is extended from May 26, 2022 to June 9, 2022. Any opposition shall be due July 28, 2022, and any reply shall be due August 25, 2022.

9. The Parties agree to keep the currently-scheduled September 20, 2022 hearing for Plaintiffs' motion for class certification.

DATED: March 10, 2022

QUINN EMANUEL URQUHART &
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/s/ Andrew H. Schapiro

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Attorneys for Plaintiffs

ATTESTATION OF CONCURRENCE

I am the ECF user whose ID and password are being used to file this Joint Stipulation and [Proposed] Order Continuing Deadlines for Discovery and Class Certification. Pursuant to Civil L.R. 5-1(h)(3), I hereby attest that each of the signatories identified above has concurred in the filing of this document.

Dated: March 10, 2022

By: /s/ Mark C. Mao
Mark C. Mao

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION**

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO,
individually and on behalf of all similarly
situated,

Plaintiffs,

v.

GOOGLE LLC,
Defendant.

Case No. 4:20-cv-03664-YGR-SVK

[PROPOSED] ORDER

Judge: Honorable Yvonne Gonzalez Rogers

Pursuant to stipulation of the Parties, the Court revises the case schedule as follows:

Scheduled Event	Current Date	New Date
Google's Opposition to Sanctions Motion	March 24, 2022	March 31, 2022
Opening Expert Reports	March 25, 2022	April 1, 2022
Plaintiffs' Reply ISO Sanctions Motion	April 7, 2022	April 11, 2022
Proposed Findings of Fact & Conclusions of Law for Sanctions Motion	April 14, 2022	April 18, 2022
Evidentiary Hearing on Sanctions Motion	April 21, 2022 at 10:00 a.m.	No change: April 21, 2022 at 10:00 a.m.
Rebuttal Expert Reports	April 22, 2022	May 6, 2022
Close of Expert Discovery	May 26, 2022	June 2, 2022
Class Certification Motion	Motion: May 26, 2022 Opp'n: July 14, 2022 Reply: August 11, 2022	Motion: June 9, 2022 Opp'n: July 28, 2022 Reply: August 25, 2022
Class Certification Hearing	September 20, 2022	No change: September 20, 2022

IT IS SO ORDERED.

DATED: _____, 2022

Hon. Yvonne Gonzalez Rogers
United States District Judge